

# **EXHIBIT 6**

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1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4  
5 IMPLICIT NETWORKS, INC., No. C10-4234 SI

6  
7 Plaintiff,

8 vs.

9 JUNIPER NETWORKS, INC.,

10 /

11 Defendant.

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16 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

17 DEPOSITION OF: TODD REGONINI

18 TAKEN ON: AUGUST 14, 2012

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24 REPORTED BY: JODY GIBNEY, CSR NO. 12308, RPR

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1 country, do you know? 13:36:15

2 A. Yes, I believe all of them are. 13:36:18

3 Q. Okay. And so AT&T, what products 13:36:22

4 has AT&T purchased from Juniper in the last two 13:36:26

5 years, say, 2010 and 2011? 13:36:29

6 A. I probably can't give an exhaustive 13:36:35

7 list, but the largest application, you know, what 13:36:40

8 you could call "marquee applications," would be 13:36:43

9 T-series platforms, MX platforms, SRX, 13:36:52

10 potentially some M-series platforms, but that I'm 13:36:56

11 not sure. 13:36:56

12 Q. How about J-series routers? 13:36:59

13 A. I do not know. 13:37:00

14 Q. One way or the other? 13:37:01

15 A. One way or the other. 13:37:03

16 Redacted 13:37:04

17 13:37:07

18 Redacted the T-series, et cetera, in a flow-based 13:37:10

19 mode. Redacted 13:37:12

20 MR. KAGAN: Objection; misstates -- 13:37:14

21 compound. 13:37:14

22 MR. HOSIE: Q. Do I misstate your 13:37:16

23 testimony, sir? 13:37:16

24 Redacted 13:37:19

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1 Q. Ahh, thank you. Okay. I'm glad I 13:37:22  
2 asked the question then. My mistake, and I 13:37:24  
3 apologize. It wasn't some clumsy attempt to trap 13:37:28  
4 you. 13:37:28

5 A. Sure. 13:37:28

6 Q. Redacted 13:37:31

7 Redacted you confirmed that 13:37:35

8 with your call to Jack Redacted 13:37:38

9 MR. KAGAN: I withdraw my objection. 13:37:40

10 MR. HOSIE: Thank you. 13:37:40

11 THE WITNESS: Yes. 13:37:41

12 MR. KAGAN: Why don't we re-ask. You 13:37:43

13 want to re-ask it? 13:37:43

14 MR. HOSIE: Yeah, I will. I apologize. 13:37:46

15 Q. So you called Jack Redacted 13:37:52

16 Redacted 13:37:54

17 Redacted and you said, To your 13:37:58

18 knowledge, Jack, Redacted 13:38:01

19 Redacted , in flow-base, and he 13:38:04

20 confirmed that they were not. Fair summary? 13:38:07

21 MR. KAGAN: I think it misstates the 13:38:09

22 testimony. 13:38:09

23 THE WITNESS: So I called Jack and asked 13:38:12

24 him specifically about the marquee applications 13:38:15

25 Redacted

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1 MR. HOSIE: Q. Yes. 13:38:17

2 A. And specifically whether they 13:38:19

3 included that MSPTC hardware, M-S-P-T-C hardware 13:38:27

4 and/or used security-based services or not, and 13:38:30

5 he confirmed that they do not. 13:38:31

6 Q. All right, sir. For Verizon, does 13:38:33

7 Verizon -- has Verizon bought any of those same 13:38:36

8 routers? 13:38:37

9 A. They have. 13:38:37

10 Q. And do they use them for flow-based 13:38:40

11 security? 13:38:40

12 A. There is -- there are a small number 13:38:48

13 that I'm aware of that do. 13:38:49

14 Q. And by "small number," what do you 13:38:51

15 mean? 13:38:51

16 A. I mean in numbers around 50 systems 13:39:02

17 versus the primary platform in that network being 13:39:09

18 on the order of a couple thousand. So in the 13:39:11

19 network application that I'm -- that I'm thinking 13:39:14

20 of, this handful of boxes, as I would call it, 13:39:18

21 the 50 versus a much larger number, would be the 13:39:21

22 ones that leveraged the -- it's actually for 13:39:23

23 network address translation. 13:39:25

24 Q. Ahh, so that has to be session-based 13:39:27

25 for NAT?

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1 A. In our implementation it is, yes. 13:39:30  
Redacted

2 13:39:34  
Redacted

3 in a flow-based way for 13:39:37  
4 network address translation? 13:39:39

5 A. In that application, yes. 13:39:40

6 Q. Redacted 13:39:42

7 Redacted 13:39:44

8 A. I can't say. 13:39:44

9 Q. Is it tens of millions, hundreds of 13:39:48  
10 millions? 13:39:49

11 A. I can't say, honestly. 13:39:50

12 Q. Are they located in this country? 13:39:53

13 A. I believe all of them are. 13:39:55

14 Q. Okay. And of the -- you said there 13:40:03  
15 were approximately 2,000 boxes in the application 13:40:05  
16 of which only 50 are yours. Who -- 13:40:09

17 MR. KAGAN: Misstates testimony. 13:40:10

18 MR. HOSIE: Q. Is that not true? 13:40:12

19 A. No, I didn't say 50 were ours, 13:40:16  
20 actually. The specific application I was 13:40:18

21 thinking of was the Redacted 13:40:22

22 Redacted 13:40:22

23 Q. Okay. 13:40:23

24 A. -- which is also all Juniper 13:40:24  
25 equipped.

1 I, Jody Gibney, R.P.R., C.S.R. No. 12308, a  
2 Certified Shorthand Reporter in and for the County of  
3 Marin, State of California, do hereby certify:  
4 That the witness named in the foregoing deposition,  
5 Todd Regonini, was duly sworn by me.

6 That said deposition was taken before me at  
7 the time and place set forth and was taken down by me  
8 in shorthand and thereafter reduced to computerized  
9 transcription under my direction and supervision, and  
10 I hereby certify the foregoing deposition is a full,  
11 true and correct transcript of my shorthand notes so  
12 taken.

13 I further certify that I am neither counsel  
14 for nor related to any party to said action nor in  
15 any way interested in the outcome thereof.

16 IN WITNESS WHEREOF, I have hereunto  
17 subscribed my name this \_\_\_\_ day of \_\_\_\_\_,  
18 2012.

19

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\_\_\_\_\_  
Jody Gibney

21 Certified Shorthand Reporter No. 12308, RPR

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